

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

*Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended*

For Six Month Period Ending JAN 29 1979
(Insert date)

Name of Registrant
DEVELOPMENT COUNSELLORS INTL., LTD.

Registration No. 1421

Business Address of Registrant
733 Third Avenue - Suite 2100
New York, N. Y. 10017

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

not applicable

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
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not applicable

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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not applicable

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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☒

If yes, identify each such person and describe his services.

not applicable

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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not applicable

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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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not applicable

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

not applicable

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9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

not applicable

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10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

NETHERLANDS ANTILLES ECONOMIC MISSION
NEWFOUNDLAND DEPT. OF INDUSTRIAL DEVELOPMENT
TRINIDAD AND TOBAGO INDUSTRIAL DEVELOPMENT CORP.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

NETHERLANDS ANTILLES: Publicized and informed U.S. businessmen about economic opportunities in the Newtherlands Antilles.

NEWFOUNDLAND: Publicized Newfoundland's investment climate in the U.S. via press releases, television appearances by provincial officials.

TRINIDAD & TOBAGO: Assisted and participated in industrial and trade shows; arranged for speeches and presentations by client to potential investors; worked with U.S. companies operating in Trinidad and Tobago to promote their operations to potential customers and suppliers in the United States.

¹ The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

not applicable

During the reporting period, I have not engaged in any political activity on behalf of any foreign principal. I have not arranged, sponsored or delivered any speeches, lectures, radio or TV broadcasts. I have not influenced or attempted to influence any relations, interests or policies of any foreign principal.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

not applicable

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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(see attached listing of receipts - monies from foreign principals)

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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not applicable

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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(see attached listing of disbursements--monies for foreign principals)

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
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not applicable

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or thing of value	Name of political organization	Name of candidate
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not applicable

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

NETHERLANDS ANTILLES ECONOMIC MISSION
NEWFOUNDLAND DEPT. OF INDUSTRIAL DEVELOPMENT
TRINIDAD & TOBAGO INDUSTRIAL DEVELOPMENT CORP.

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

NOT APPLICABLE

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
articles
☐ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (Specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☒ Newspapers ☐ Libraries
☐ Legislators ☒ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (Specify) _____

21. What language was used in this political propaganda:

☒ English ☐ Other (Specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐

Exhibit B⁷ Yes ☐ No ☐

If no, please attach the required exhibit.

NOT APPLICABLE

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

NOT APPLICABLE

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐
NOT APPLICABLE

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.
NOT APPLICABLE

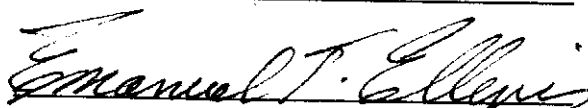
The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)



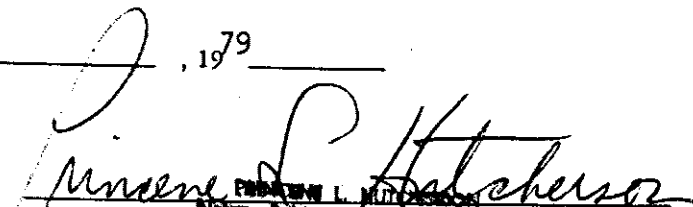
TED M. LEVINE, President



EMANUEL T. ELLENIS, Vice President

Subscribed and sworn to before me at 733 Third Av., New York, N. Y. 10017

this 14th day of March, 1979


VINCENT L. HATCHERSON
(Signature of Notary or Other Officer)
No. 31-1906575
Qualified in New York County
Commission Expires March 30, 1979

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

Netherlands Antilles Economic Mission

Receipts

1978	8/1/78 - 1/19/79	Total	Fee	Expense
1	Aug 8	1575-	1500-	75-
2	Sept 27	1575-	1500-	75-
3	Oct 17	1575-	1500-	75-
4	17	595-		595-
5	Nov	0-		
6	Dec 4	1575-	1500-	75-
7	19	1582-	1500-	82-
8	1979			
9	Jan 5	1575-	1500-	75-
10		10052-	9000-	1052-
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Newfoundland Dept. of Industrial Development Receipts

1978	8/1/78 - 1/29/79	Total	Fee	Expense
1 Aug 13		1235001	1235001	
2 Sept		— 0 —		
3 Oct 10		411667	411667	
4 Nov 9		411667	411667	
5 Dec 5		248668		248668
6 18		1235001	1235001	
7 1979				
8 Jan 1		359713	359713	2570
9 1		363923	359713	6780
10 1		4265640	4007622	258018
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Trinidad & Tobago Industrial Development Corp. Receipts

1978	8/1/78 - 1/19/79	Total	Fee	Expense
1 Aug 26		338350	3300 -	8350
2 Nov 1		3300 -	3300 -	
3 1		335249	13300 -	5249
4 Dec 4		344176	3300 -	14176
5 12		335915	3300 -	5915
6 28		9900 -	9900 -	
7 1979				
8 Jan 9		3166189	4200 -	2746189
9		5839869	30600 -	2779869
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Netherland Antilles Economic Mission

Disbursements

1978		8/1/78 - 1/29/79	Purpose	Amount	Total
1	Sept 16	Area Development	Space	49563	
2	Oct 13	Action Photo	Photo	67	
3	10	Film Composer Group	Films Composition	6420	
4	Aug 3	Frank Knight	Expense	590	
5	9	Action Photo	Photo	975	
6					57615
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Newfoundland Dept. of Industrial Development
Disbursements

1978	8/1/78 - 1/29/79	Purpose	Amount	Total
1	at 5 Susan Rye L	Expense	1140	
2	10 " "	"	15-	
3	13 Air Canada	Freight	1570	
4	14 Robt. C. Keith	Transportation	342-	
5	15 Copeland Cutler	"	200818	
6	17 Emanuel T. Ellenis	Expense	3160	
7	Dec 6 Brod Printing & Litho.	Printing	11193-	
8	Peter Glenn Pubn.	Directory	6780	
9	15 E.T. Ellenis	Expense	2835	
10	16 Irene Cohen	"	1715	
11	1979			
12	Jan 12 Emanuel T. Ellenis	Expense	6155	
13	19 " "	"	166-	
14	19 " "	"	4485	
15	Feb 13 " "	"	10072	
16	13 Irene Cohen	"	3565	
17	7 " "	"	18375	
18	17 Finley Stat Service	Photos	5065	
19				1437445
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Trinidad + Tobago Industrial Development Corp.

Disbursements

1978	8/1/78 - 1/29/79	Purpose	Amount	Total
Aug 16	Ted M. Levine	Expense	19.60	
Oct 13	U.S. News + World Report	Subscription	2-	
Nov 20	Doyle Delta	Storage	36.29	
Nov 15	Media Distribution	Printing	119.04	
Nov 16	Millie Brown	Expenses	21.50	
Dec 1	Newsweek	Magazines	37.5	
1979				
Feb 26	Action Photo Co.	Photos	7.02	
				109.10

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

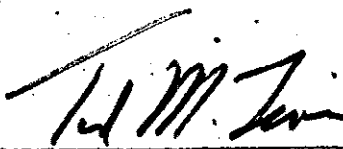
Yes X or No

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes or No

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)


Signature

3/14/79
Date

TED M. LEVINE

Please type or print name of signatory on the line above

President

Title